

SAUL EWING

LLP

Christie R. McGuinness

Phone: (212) 980-7205

christie.mcguinness@saul.com

www.saul.com

September 24, 2024

The Honorable Robyn F. Tarnofsky
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

RE: *Zaziiz S. L. Dinkins v. Alejandro Mayorkas*
1:23-cv-10660-RFT

Dear Judge Tarnofsky:

Application GRANTED. The stay of discovery is extended through November 4, 2024. The parties shall by that date provide a joint update on the status but not the substance of their settlement talks.

DATED: September 25, 2024
New York, New York

SO ORDERED

ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

As Your Honor is aware, we represent Plaintiff Zaziiz S. L. Dinkins as *pro bono* counsel for the limited purpose of conducting a Settlement Conference in the above-referenced matter. We, along with counsel for Defendant Alejandro Mayorkas, United States Secretary of Homeland Security, submit this second update regarding the status of discovery pursuant to the Court's Case Management Plan (*see* ECF No. 82) and, respectfully, request a continued brief stay of discovery in this matter pending continued settlement discussions.

First, as detailed in the first status update, notwithstanding the appearance of the undersigned as *pro bono* counsel for Plaintiff, the parties have engaged in limited discovery. On August 25, 2024, Plaintiff served Defendant with her answers to Defendant's interrogatories. Plaintiff has advised Defendant that she is in the process of collecting additional responsive documents and information and will produce them as soon as possible.

Second, on September 4, 2024, the parties appeared for a Pre-Settlement Conference Scheduling Call with Judge Ona T. Wang, and on September 26, 2024, the parties will be appearing for another Pre-Settlement Conference Call to formalize the details of the Settlement Conference, currently scheduled for October 30, 2024 (*see* ECF No. 85). After continuing to confer, the Parties still believe that there is a realistic opportunity to resolve this matter at the October 30, 2024 Settlement Conference. Thus, they respectfully seek a continued stay of discovery pending completion of the Settlement Conference. The parties seek a continued stay of discovery to allow them to conserve their time and resources to focus on the submission of mediation statements and to prepare for the Settlement Conference. The parties are prepared to submit an update to the Court promptly upon the completion of the Settlement Conference to advise as to whether the matter has been resolved.

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We thank the Court for its attention to this matter and consideration of this request.

Sincerely,

Christie R. McGuinness

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CC:

All Counsel Of Record Via ECF.